

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

KINGSLEY R. CHIN,

Defendant.

No. 1:21-cr-10256-IT

STIPULATION

It is hereby stipulated and agreed by and between the United States of America, through its undersigned counsel, and defendant Kingsley Chin, through his undersigned counsel, that:

1. Dr. Jason Montone performed surgeries at, among other places, Doctors Hospital in Kansas City, Missouri. If called upon as witness, a representative of Doctors Hospital would testify that based on business records, on one or more occasions in May 2013 and May 2015, Dr. Montone was the attending physician for a procedure that involved the use of a SpineFrontier product for a patient covered by Missouri Medicaid, which is funded in part by a federal health care program.
2. Dr. Michael Murray performed surgeries at a Veterans Affairs hospital in the Bronx, New York, and other New York metropolitan area hospitals. If called upon as a witness, a representative of Veteran's Affairs would testify based on business records that, on one or more occasions in March 2016 and January 2017, Dr. Murray used a SpineFrontier product that was paid for by a federal health care program at the Veteran's Affairs hospital.
3. Dr. John Atwater performed surgeries at the Indian River Medical Center in Vero Beach, Florida. If called upon as a witness, a representative of Cleveland Clinic, of which Indian River Medical Center is an affiliate, would testify based on business records that, on one or more occasions in October 2015 and November 2015, Dr. Atwater was the attending physician for a procedure that involved the use of a SpineFrontier product for a patient covered by Medicare, which is a federal health care program.

<p>KINGSLEY CHIN</p> <p>By his attorneys,</p> <p><u>/s/ Barry S. Pollack</u></p> <p>Barry S. Pollack (BBO #642064) Joshua L. Solomon (BBO #657761) POLLACK SOLOMON DUFFY LLP 31 St. James Avenue, Suite 940 Boston, MA 02116 (617) 439-9800</p>	<p>LEAH B. FOLEY United States Attorney</p> <p><u>/s/ Christopher Looney</u> ABRAHAM R. GEORGE CHRISTOPHER LOONEY MACKENZIE A. QUEENIN Assistant U.S. Attorneys 1 Courthouse Way John Joseph Moakley U.S. Courthouse Boston, MA 02210 (617) 748-3100</p>
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Dated: May 9, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused this document to be filed through the ECF system on May 9, 2025.

/s/ Christopher Looney
CHRISTOPHER LOONEY